



COMMONWEALTH OF PENNSYLVANIA
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December 7, 2022

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Honorable Christopher C. Conner
United States District Court for the Middle District of Pennsylvania
228 Walnut Street, P.O. Box 983
Harrisburg, Pa 17108

Re: *Doe v. Commonwealth of Pa., et al.*, Case No. 1:19-CV-2193
Status Report Related to Settlement

Dear Judge Conner:

I write on behalf of Defendant Commonwealth of Pennsylvania, Department of Human Services (“DHS”) to provide an update on the status of settlement as requested by this Court’s Order. (Doc. 129)

The parties entered into a settlement agreement which was fully executed as of September 2, 2022. Thereafter, undersigned counsel submitted the settlement agreement and request for payment through the administrative channels at the Office of Attorney General (“OAG”). Commonwealth agencies may pay qualifying settlements through the Department of General Services’ Bureau of Risk and Insurance Management (“BRIM”) self-insurance program. The process requires approvals from the OAG, Office of General Council, and the agency prior to submission to BRIM. Defendant DHS’s request for payment in this matter is currently with BRIM and Defendant DHS has requested that BRIM expedite payment, if possible.

On Monday, December 5th, Plaintiff’s counsel requested payment by Friday, December 9th and indicated an intention to file a Motion to Enforce the settlement agreement if payment is not received. While Defendant DHS understands Plaintiff’s desire for payment, Defendant believes a motion to enforce the settlement agreement is unnecessary. Defendant has requested payment through the proper channels, and like Plaintiff, Defendant awaits BRIM, a non-party government agency, to complete its process and issue payment. Once the check is received by the OAG, it will promptly forward to Plaintiff as set forth in the Settlement Agreement.

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Sincerely,

s/ Daniel P. McGannon

Daniel P. McGannon
Deputy Attorney General

CC: **Meredith Shippee, Esquire**
Casey Ryan, Esquire
Heather Steele, Esquire
Brian Casal, Esquire